



May 9, 2005

Mr. Ron Plaseied  
Base Closure Manager  
BRAC Program Management Office West  
1230 Columbia St., Suite 1100  
San Diego, CA 92101

Re: OU-2B Remedial Investigation, Alameda Point

Dear Ron:

It has just come to the City's attention that the Navy's *Draft OU-2B Remedial Investigation Report, Sites 3, 4, and 21, Alameda Point* ("Draft OU-2B RI") states that the total carcinogenic risk for current commercial/industrial use exceeds the risk management range for two buildings at Alameda Point: Building 14 and Building 162. It is our understanding that this conclusion is based on modeling performed by the Navy of potential exposures to TCE in indoor air, and that the Navy modeled vapor intrusion into occupied spaces from measured groundwater TCE concentrations. It is our further understanding that USEPA rejected the Navy's health risk assessment, as presented in the Draft OU-2B RI, but the City does not know the details of USEPA's disagreement.<sup>1</sup>

Because Buildings 14 and 162 are occupied by tenants, and because the Navy's Draft OU-2B RI indicates a potentially unacceptable exposure over the long term, the City requests that the Navy take immediate action consisting, at a minimum, of the following steps: (1) notify the City and the occupants of Buildings 14 and 162 of the nature of the exposure and any interim mitigation that might be advisable; and (2) collect indoor air samples in Buildings 14 and 162 to help validate and evaluate the prior modeling and to determine if indoor air concentrations are acceptable. We request that the Navy not delay these actions. In addition, the City requests that the Navy revise and redo the health risk assessment, tailored to the conditions in Buildings 14 and 162 and consistent with environmental regulatory agency protocols, in order to more

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<sup>1</sup> It does not appear that any of the other environmental regulatory agencies commented on the human health risk assessment in Appendix F of the Draft OU-2B RI.

Development Services Department

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conclusively determine whether or not exposure to soil vapors in those buildings poses an unacceptable risk to the building occupants.

In an April 6, 2005 telephone call to Dr. Russell, environmental advisor to ARRA and the City, Thomas Macchiarella stated that the Navy's modeling indicates that workers in Buildings 113, 163 and 398 also may be experiencing health risks exceeding the risk management range. The Draft OU-2B RI does not mention these buildings in that regard, as it does Buildings 14 and 162. The City's request of the Navy to take immediate action extends to all buildings for which it is prudent to assume that carcinogenic risks for current commercial/industrial use may exceed the risk management range.

Please advise me immediately of the Navy's schedule for taking these steps. If you have any questions or need additional information, please call me at (510)749-5889.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Proud", with a large, stylized loop at the end.

Stephen Proud  
Alameda Point Project Manager